

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

UNITED STATES OF AMERICA	§	
Plaintiff,	§	
	§	
v.	§	NO: 6:24-cv-00027
	§	
\$698,230.00 IN UNITED STATES	§	
CURRENCY	§	
Defendant.	§	

COMPLAINT FOR FORFEITURE IN REM

In accordance with Fed. R. Civ. P. Supplemental Rule G(2), the United States of America, Plaintiff, brings this complaint and alleges as follows:

Nature of the Action

1. This is an action to forfeit property to the United States for violations of 18 U.S.C. §§ 1343 (Wire Fraud), 1349 (Conspiracy to Commit Wire Fraud), 1956 (Money Laundering), and 1957 (Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity).

Defendant In Rem

2. The Defendant Property is \$698,230.00 in United States currency seized from Cathay Bank account xxxx9811 in the name of LSM Trade Limited on or about October 30, 2023, in Plano, Texas. The Defendant Property is currently in the custody of the United States Secret Service.

Jurisdiction and Venue

3. The Court has subject matter jurisdiction over an action commenced by the United States pursuant to 28 U.S.C. § 1345, and over an action for forfeiture pursuant to 28 U.S.C. § 1355(a).

4. The Court has *in rem* jurisdiction over the Defendant Property pursuant to 28 U.S.C. § 1355(b)(1)(A) because acts or omissions giving rise to the forfeiture occurred in this district.

5. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b)(1)(A) because acts or omissions giving rise to the forfeiture occurred in this district.

Basis for Forfeiture

6. The Defendant Property is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) because it is personal property involved in a transaction or attempted transaction in violation of 18 U.S.C. §§ 1956 and 1957, or any property traceable to such property, and pursuant to 18 U.S.C. § 981(a)(1)(C) because it is personal property which constitutes or is derived from proceeds traceable to a violation of any offense constituting a specified unlawful activity (as defined in 18 U.S.C. § 1956(c)(7)), namely, a violation of 18 U.S.C. § 1343, or a conspiracy to commit such offense (18 U.S.C. § 1349).

Facts

7. The facts and circumstances supporting the forfeiture of the above-described property are contained in the Affidavit of Special Agent Brad Schley, which is attached hereto and incorporated herein by reference.

Potential Claimants

8. The known potential claimant to the Defendant Property is:
- a. Shiming Li
LSM Trade Limited
20 Confucius Plaza 44C
New York, New York 10002

Claim for Relief

9. The United States respectfully requests that the Court forfeit the Defendant Property to the United States, award costs and disbursements in this action to the United States and order any other relief that the Court deems appropriate.

Respectfully submitted,

DAMIEN M. DIGGS
UNITED STATES ATTORNEY

/s/ Robert Austin Wells
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ATTORNEYS FOR THE UNITED STATES

VERIFICATION PURSUANT TO 28 U.S.C. § 1746

I, Brad Schley, hereby state that:

1. I am a Special Agent with the U.S. Secret Service.
2. I have read this Complaint, and the information contained herein is true and correct to the best of my knowledge.
3. The information contained in this Complaint comes from the official files and records of the United States, statements from other law enforcement officers, and my investigation of this case.

I state and verify under penalty of perjury that the foregoing is true and correct.


Brad Schley
Special Agent
United States Secret Service

Dated: 1-24-24